REMARKS

Claims 1-3, 5-13, 15-19, 21, and 23-27 remain pending in the application. Claims 4, 14, 20, and 22 have been canceled without prejudice or disclaimer. Claims 1, 5-11, 15-19, 21, and 23-27 have been amended without introduction of new matter. Favorable reconsideration is respectfully requested in view of the above amendments and the following remarks.

Claims 1-3, 11-13, 20 and 21 remain rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Krug et al. (US Patent 6,721,736) (hereinafter "Krug"). This rejection is respectfully traversed.

The rejection of claim 20 has been rendered moot by the cancellation of this claim without prejudice or disclaimer.

Regarding the remaining claims 1-3, 11-13, and 21, the Office continues to allege that Krug discloses a method for presenting structured digital content. Applicant respectfully disagrees that the "structure" disclosed by Krug is comparable to the hierarchical structure defined by Applicant's claims. In order to expedite favorable prosecution of the application, the claims have been amended to even more clearly define aspects of the invention. Support for these amendments may be found in the specification at, for example, Figure 2 and its accompanying text spanning pages 6-16.

As explained in the specification on page 5, the various embodiments are directed to the rapid presentation of structured digital content items using a pointing device to quickly view categories and digital content items within the categories. One aspect of this involves organizing the various categories and digital content items into layers. What are presented to the user at any given time are only those categories and/or digital content items associated with a particular layer. By selecting (e.g., by means of a pointing device such as a mouse) an area of the display associated with one of the categories, a user is able to navigate to a next layer of displayable content which is then presented. When the user navigates to a point at which there are no further layers, the various digital content items are then mapped onto the display. The user may then make a selection from these digital content items.

Another aspect relates to the use of two different types of files: structure files and content files. The structure files define not only what the various categories and subcategories are, but also at what layer these categories/subcategories will be displayed to the user. An exemplary structure file is presented in the application text spanning pages 6

through 7. A number of exemplary content files are presented in the application text spanning pages 8 through 10. Thus, the structure file is referenced for so long as the user is navigating between categories and subcategories. When a "last" layer is reached, selection of a category/subcategory enables one or more particular content files associated with the selected category/subcategory to be identified and accessed to provide the one or more corresponding digital content items to be presented to the user.

The Krug reference is believed not to anticipate the various embodiments defined by independent claims 1, 11, and 21 at least because Krug fails to disclose or even suggest:

- a first file that "defines a hierarchical structure for presenting digital content items, the hierarchical structure defining a plurality of layers into which digital content items are classified"

- "if the user has selected the first display location, then determining whether the category mapped to the selected first display location is associated with a next-lower layer"

- "if the category mapped to the selected first display location is associated with a next-lower layer, then making the next-lower layer the present layer, and repeating [earlier defined steps]"

- "if the category mapped to the selected first display location is not associated with a next-lower layer, then reading one or more second files associated with the category mapped to the selected first display location to obtain one or more sets of one or more digital content items associated with the category mapped to the selected first display location in the present layer, ..."

- "... wherein each of the second files associates each of one or more digital content items with at least one of the categories"

- "mapping the obtained one or more sets of one or more digital content items to areas on the display"

In comparing Krug with the presently-claimed embodiments, it is important to recognize that Krug deals very little with the particulars of how a user is to navigate through information. Instead, Krug is concerned with the problem presented when a metasearch engine (i.e., one that does not carry out searches in the literal sense, but rather functions as an interface to primary search engines -- see Krug at column 2, lines 50-52) is to present to the user information received from a plurality of so-called primary search engines, each

supplying information in a different format. (See, e.g., Krug at column 3, lines 16-21.) One aspect of Krug's technique involves recognizing the syntax of the information provided by each of the various primary search engines, so that the informational content provided by these primary search engines can be extracted and supplied to a user in a unified format. (See, e.g., Krug at column 6, lines 50-53.) Krug, however, neither discloses nor suggests that the "unified format" involves presenting to the user only particular categories and/or digital content items based on what layer those categories and/or digital content items are associated with.

In support of its rejection, the Office relies on Krug's Figure 7 as being comparable to Applicant's claimed "first file". However, Krug's Figure 7 is a hierarchical syntax tree that merely discloses how various informational content items relate to one another. Krug's Figure 8 (relied on in the Office's "Response to Arguments") is merely a three-dimensional feature space for HTML syntax elements. The hierarchical syntax tree is not used for the purpose of defining "a hierarchical structure for presenting digital content items" (emphasis added) as required by Applicant's claims.

The Office further relies on Krug's Figure 2 at reference sign 14 (shown as "Hits") as corresponding to the claimed second files. However, Krug's "Hits" 14 are not files that are accessed only "if the category mapped to the selected first display location is not associated with a next-lower layer" as now recited in Applicant's claims.

Additionally, the Office alleges that "Krug discloses a user-selected location, and displaying the level after the user selection is received in Figure 5 at reference sign 58 (shown as the user selection of the desired category)." Applicant respectfully disagrees. Krug describes Figure 5 as "A typical search response of the popular AltaVista primary search engine displayed in an Internet browser." Within Figure 5, reference sign 58 indicates "a consecutive arrangement of result frames 58, that includes the URL of the corresponding hit 60." Thus, when a user selects one of these URL's the user is shown whatever content is located at the web sites indicated by the selected URL. The displayed information does not comprise one or more digital content items obtained from a second file and mapped to areas on the display by the system of Krug, as would be required for Krug to disclose the feature defined by Applicant's claims.

In view of the foregoing, it is respectfully asserted that Krug neither discloses nor suggests the claimed subject matter of any of independent claims 1, 11, and 21 nor of any of

the dependent claims 2-3, and 12-13 that variously depend from independent claims 1 and 11. Accordingly, it is respectfully requested that the rejection of claims 1-3, 11-13, and 21 under 35 U.S.C. §102(e) be withdrawn.

Claims 4-5, 14-15 and 22-23 remain rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Krug in view of Wen-Syan Li (U.S. Patent 6,691,108) filed 12/12/2000, patented 2/10/2004 (hereinafter Li). This rejection is respectfully traversed.

The rejection of claims 4, 14, and 22 has been rendered moot by the cancellation of these claims without prejudice or disclaimer.

As to the remaining claims 5, 15, and 23, these claims have been amended so that they now depend from independent claims 1, 11, and 21, respectively. These claims have been further amended for compatibility with their newly amended base claims. No new matter has been added.

Claims 5, 15, and 23 are patentably distinguishable over the Krug patent for at least the reasons set forth above with respect to independent claims 1, 11, and 21. Li does not make up for the deficiencies of Krug. Therefore, claims 5, 15, and 23 are patentably distinguishable over any combination of Krug and Li at least because such a combination would still fail to include:

- a first file that "defines a hierarchical structure for presenting digital content items, the hierarchical structure defining a plurality of layers into which digital content items are classified"
- "if the user has selected the first display location, then determining whether the category mapped to the selected first display location is associated with a next-lower layer"
- "if the category mapped to the selected first display location is associated with a next-lower layer, then making the next-lower layer the present layer, and repeating [earlier defined steps]"
- "if the category mapped to the selected first display location is not associated with a next-lower layer, then reading one or more second files associated with the category mapped to the selected first display location to obtain one or more sets of one or more digital content items associated with the category mapped to the selected first display location in the present layer, ..."

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- "... wherein each of the second files associates each of one or more digital content items with at least one of the categories"
- "mapping the obtained one or more sets of one or more digital content items to areas on the display"

The Office's reliance on Li is inapposite. Li discloses a focused search engine and method directed to crawling vast search spaces comprising markup language documents. Categorization of search results may be initiated by the search engine itself, or may be specified in conjunction with the original request for information. The Office relies on Li at column 2, lines 12-16 and 41-46, but these portions merely describe techniques for performing a search – not for presenting structured digital content items to a user as defined by Applicant's claims. The Office further relies on Li at column 4, lines 26-28, which says "In one embodiment, a focused search engine and method may display query results organized by topic category, as shown on the right side of FIG. 1." However, it is evident from Li's FIG. 1 that the various categories of information obtained from the search are all presented to the user in a single screen of information. Nowhere does Li describe or even suggest any technique in which a user navigates through layers of information by selecting categories mapped to display locations until a lowest layer is reached at which point digital content items are presented.

For at least the foregoing reasons, claims 5, 15, and 23 are believed to be patentably distinguishable over the Krug and Li patents, regardless of whether these patents are considered individually or in any combination. It is therefore respectfully requested that the rejection of claims 5, 15, and 23 under 35 U.S.C. §103(a) be withdrawn.

Claims 6-9, 16-19, and 24-27 remain rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Krug in view of Li, and in further view of Arnold et al. (U.S. Patent 6,745,161), filed 7/10/2000, patented 6/1/2004 (hereinafter "Arnold"). This rejection is respectfully traversed.

Claims 6-9, 16-19, and 24-27 variously depend from claims 5, 15, and 23, and are therefore patentably distinguishable over any combination of Krug and Li for the reasons set forth above. Arnold fails to make up for the deficiencies of Krug and Li, so that any combination of Krug, Li and Arnold would still lack at least the various features discussed above.

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Moreover, the Office relies on Arnold at the bottom of Figure 7, where Arnold recites "Identified concepts and related information is embedded in the original source documents or in proxy documents containing concept tags." Applicant does not consider this aspect of Arnold to be of particular relevance, since it does not describe storing an indication that <u>a user has selected</u> one or more digital content items corresponding to a particular display location.

For at least the foregoing reasons, claims 6-9, 16-19, and 24-27 are believed to be patentably distinguishable over any combination of the Krug, Li, and Arnold patents. Accordingly, it is respectfully requested that the rejection of these claims under 35 U.S.C. §103(a) be withdrawn.
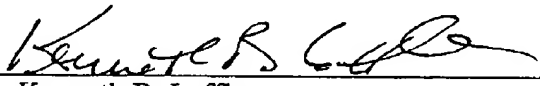
Claim 10 remains rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Krug in view of Arnold. This rejection is respectfully traversed.

Claim 10 depends from claim 1, and is therefore patentably distinguishable over the prior art of record for at least the reasons set forth above with respect to that base claim. It is therefore respectfully requested that the rejection of claim 10 under 35 U.S.C. §103(a) be withdrawn.

The application is believed to be in condition for allowance. Prompt notice of same is respectfully requested.

Respectfully submitted,
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